

Proceeding: IN THE MATTER OF 1998 BIENNIAL REGULATORY REVIEW -- AMENDMEN ☒ Record 1 of 1
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In the Matter of 1998 Biennial Regulatory Review - Amendment of Part 97 of the Commission's Amateur Service Rules, FCC WT Docket 98-143

I am an amateur radio operator (KC6WCT) who teaches amateur radio in high school. I will address in the first three sections three concerns I have about amateur radio license restructuring. They are the ease of entry for the introductory license, the retention of antiquated morse code requirements, and encouragement to reduce the number of license classes to three or less. The fourth section consists of my recommendations.

I. Ease of Entry for Introductory License

Whether you call the introductory class license technician or novice, it must seem realistically obtainable or potential hams will just go to other hobbies. New hams are the lifeblood and future of our hobby. I teach amateur radio at my high school and it concerns me that the written part is now harder than it has ever been before. As commented upon in the September 1998 QST, there are more novice questions now than there were questions for all the licenses back in 1962. Combining the novice and technician pools for a total number of almost 1,000 questions in the question pool will make it even harder. Contrast that with the 20 questions the potential novice of yesteryear faced. If we are to combine question pools then let us combine advanced and extra for more dedicated hams.

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Is it really necessary for new hams to chart on graphs safety exposure levels? Would it not be better to just limit the amount of power for the first license? (for example, no operations with more than 40 watts of power) If we want to make our hobby attractive to young people they must believe their initial license is realistically obtainable. This means a test easier or at least no harder than the ones we have now. It also means an introductory morse code speed of no higher than 5 words per minute.

As a teacher I can tell you that combining the novice and technician pools or having the first morse code speed test as 12-13 words per minute will significantly lower the number of young people I can introduce to ham radio and may even threaten my whole program. We want and need young people in ham radio. I am not proposing lowering the standards. I am proposing not continually increasing the standards to the point where we lose young people.

II. Morse Code Requirements

The second concern I have is the retention of antiquated morse code requirements. I hope you are going to do more than take a simple vote or blindly adopt the position of the American Amateur Radio Relay League (ARRL). (Though an honorable institution of which I am a member, the ARRL does not always represent the future. The average age of an ARRL member is 57 years old, up from 53 years just six years ago.) I do not believe the ARRL surveys mentioned in your NPRM reflect accurately the non-ARRL members. I hope you take an honest unsentimental look at

what amateur radio really needs and the best and easiest way for you at the FCC to enforce it. This is a great opportunity for you to make some significant permanent changes. Please do not take the easy way out which will just necessitate making more changes later on.

Your NPRM assessment is correct on the decreasing importance of morse code. Take a look at our military, our merchant marine service, and the amateur radio communities of Japan, Germany, New Zealand, and the United Kingdom. If that does not convince you, then just listen to the amateur radio bands.

While morse code requirements may have once been legitimate, they are no longer so. The only reason they are required at all is a 50 year old requirement of S25.5 in the international regulations. This will likely go away in 2002 when the matter is expected to come up.

Morse code requirements are worse than merely antiquated. They are counter productive to reaching a generation raised on the internet and with computers. Historically, the morse code speed requirements were used in 1936 to restrict the number of operators, not to meet new requirements. That was the public reason why the requirements were increased from 10 words per minute to 13 words per minute in 1936. Requiring 20 words a minute for any license class has only been with our amateur radio community since 1951.

There is no evidence that morse code makes an operator more desirable, motivated, or better qualified. Focusing so much effort on the

antiquated morse code requirement further interferes with the amateur radio purpose of advancing the radio art.

III. Streamline and Simplify License Classes

Make it easy on yourself. Reduce the number of amateur radio licenses to 3 or less! You can reduce the number of license classes on the high end just as easily as on the low end. Given the small difference in privileges, there is no reason not to combine the extra and advanced license. This would leave a technician, general, and extra license. Until 1936 we had only three license classes and did just fine. You could "grandfather" novices and technician pluses into one of the three categories so your database would accurately reflect everyone's status.

Most countries have one or two license classes and there is no reason why we cannot do the same. The only requirement for testing and a license is to insure minimum proficiency. True proficiency comes with practice, not by taking tests and having the F.C.C. keep track of different classes for the prestige of the operator. That will mean less testing for the VECs and less record keeping for you.

Enforcement will also be easier for two reasons. Fewer license classes would make it easier than now figuring which of six different classes a potential violator belongs to and then figuring if he was operating within his privileges.

The second reason fewer radio license classes will help enforcement is fewer classes would mean you could keep the status of

everyone's license class in your data base. We need you to keep a person's license class in your data base. To help you be effective with enforcement we need to access the data base as we do now. Having each amateur radio operator show proof of his license does not help us detect violations on the air and report them. (For instance, if we can't tell whether a technician is a technician or a technician plus or a novice in your data base then it is hard to report a violation of using the HF frequencies.)

IV. Recommendations

- Make the introductory license easy enough that it is still attractive for young people.
- Reduce the number of license classes to three or less.
- I would go even farther in allowing testers to test one level below their license. I would allow registered VECs to test up to their level. The only guidelines for VECs giving tests should be that the testers should have at least the requirements of those they are testing. An extra can already test an extra. An advanced class licensee should be able to test for advanced, a general class licensee should be able to test for a general and a technician licensee should be able to test for a technician class license.
- Until the next ITU convention, the **only** morse code test should be five words per minute. If the next international convention does away with the requirement of morse code for access to high frequency bands, give consideration to eliminating the morse code requirements altogether. There is no reason to require more than 5 words per minute. No other mode of amateur radio communication requires any demonstration of proficiency.
- I do not believe there is any need to modify the taking of the morse code test. I have neither seen nor heard about evidence of extensive cheating. Reducing the requirement to five words a minute will also have the advantage of reducing the impetus to cheat.

Thank you for your consideration. I know you have a difficult job. Regardless of what you do, there will be a lot of work for you and criticism by those who never want to change. That being the case, I hope you move boldly to simplify testing, reduce the number of license classes, and do whatever else will make your job easier for the long term.

Sincerely,

Ed Griffith, KC6WCT
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